UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	X
RAJAGOPALA SAMPATH RAGHAVENDRA a/k/a RANDY S. RAGHAVENDRA,	1.

Plaintiff.

NOTICE OF MOTION FOR RECONSIDERATION

-against-

Index No.: 06-CV-6841 (PAC) (HBP)

THE TRUSTEES OF COLUMBIA UNIVERSITY, LEE C. BOLLINGER, individually and as President of Columbia University, ROBERT KASDIN, individually and as Senior Executive Vice President of Columbia University, and WILLIAM R. SCOTT, individually and as a Deputy Vice-President of Columbia University,

Defendants.

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 26 and 59 and Local Rule 6.3. Plaintiff intends to move this Court, at such a time as he may reasonably be heard, and upon this Notice and the Memorandum of Law attached hereto, for the Court to reconsider its decision denying Plaintiff discovery under request number 31 in Plaintiff's First Set of Document Demands, which requests:

All documents concerning disciplinary action taken against any employee who was previously employed or is currently employed in any officer grade position, including and up to the executive vice president level, in the IRE and Facilities departments during all relevant times [the beginning of Plaintiff's employment and the present, as defined in Specific Instruction 18].

Dated: Garden City, New York

June 15, 2009

LAW OFFICES OF LOUIS D. STOBER, JR., LLC

Sheila S. Hatami (SH 7954))

Attorneys for Plaintiff 350 Old Country Road

Suite 205

Garden City, New York 11530

(516) 742-6546

(516) 742-8603 fax

To: Susan Friedfel, Esq.

Ed Brill, Esq.

Proskauer Rose LLP

1585 Broadway

New York, NY 10036-8299

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

RAJAGOPALA SAMPATH RAGHAVENDRA a/k/a RANDY S. RAGHAVENDRA.

Plaintiff,

Civil Action No. 06-CV-6841 (PAC) (HBP)

STIPULATION

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THE TRUSTEES OF COLUMBIA UNIVERSITY, LEE C. BOLLINGER, individually and as President of Columbia University, ROBERT KASDIN, individually and as Senior Executive Vice President of Columbia University, and WILLIAM R. SCOTT, individually and as a Deputy Vice-President of Columbia University,

Defendants.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the parties herein, that Defendants', The Trustees of Columbia University in the City of New York, Lee C. Bollinger, Robert Kasdin, and William R. Scott, time to file any opposition

Plaintiff's time to file a reply brief shall be extended until June 26, 2009.

Dated: June 19, 2009

LAW OFFICES OF LOUIS D. STOBER, JR., LLC

By:

Sheila S. Hatami, Esq. 350 Old Country Road

Suite 205

Garden City, New York 11530

516.742.6546

Attorneys for Plaintiff

PROSKAUER ROSE LLP

Bv:

to Plaintiff's Motion for Reconsideration shall be extended until June 23, 2009, and further that

Edward A. Brill, Esq.

Susan D. Friedfel, Esq.

1585 Broadway

New York, New York 10036-8299

212.969.3000

Attorneys for Defendants

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SOUTHERN DISTRICT OF NEW YORK	
X RAJAGOPALA SAMPATH RAGHAVENDRA a/k/a RANDY S. RAGHAVENDRA,	Index No.: 06-CV-6841 (PAC)
Plaintiff,	(HBP)
-against-	
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Defendants.	
X	
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Attorneys for Plaintiff
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Garden City, New York 11530
(516) 742-6546
(516) 742-8603 fax